REMARKS

The final Office Action mailed April 10, 2008 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Entry of the amendment is proper under 37 CFR §1.116 since the amendment: (a) places the application in condition for allowance (for the reasons discussed herein); (b) does not raise any new issue requiring further search and/or consideration (as the amendment merely incorporates features that have previously been considered); and (c) places the application in better form for appeal, should an appeal be necessary. The amendment is necessary and was not earlier presented because it is made in response to new art presented for the first time in the final rejection. Entry of the amendment and reconsideration of the application are thus respectfully requested.

Claims 1-30 are now pending in this application. Claims 1-30 stand rejected.

Claims 1-30 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,853,867 to Klindt et al. (hereinafter referred to as "Klindt") in view of U.S. Patent No. 6,732,191 to Baker et al. (hereinafter referred to as "Baker"). Applicants respectfully traverse this rejection.

Klindt describes an apparatus for accessing, controlling and monitoring a programmable logic controller with a network client having a conventional web browser. The apparatus includes an archive, an interface, and a library. The archive compiles an application written in code supported by the web browser. The interface responds to the application for establishing a connection between the controller and the network client. Further, the library responds to the application for supporting communication between the controller and the network client upon establishing a connection therebetween. As acknowledged by the Examiner, Klindt does not describe an ACM CPU that is coupled directly to a web server and database module. Rather, Klindt describes a PLC CPU module that is coupled to a web server through a backplane. Accordingly, the system described by Klindt is susceptible to errors and delays due to the added complexity of the system.

Baker describes a control system that allows a user to access an input/output device over a communication network using a web browser. The system includes an input/output device that is interconnected directly to a web server. However, referring to FIG. 5 of Baker, Baker does not describe an ACM CPU that is coupled directly to a web server and database module located outside a network module and including a database configured to store a file (the web server and database module of the present claims includes a database that is connected to a web server that is further connected to an interface, see specification, paragraph [0041]).

Claim 1 recites a web-enabled automation control module (ACM) system including "at least one network module configured to receive a request for a file from a network; a web server and database module located outside said network module and including a database configured to store the file; and an ACM central processing unit (CPU) configured to send ACM data to said web server and database module to embed ACM data in the file to facilitate transferring ACM data to the at least one network module in response to the request, said ACM CPU coupled directly to said web server and database module."

Klindt does not describe or suggest an ACM system as recited in Claim 1. More specifically, Klindt does not describe or suggest an ACM system including an ACM CPU that is coupled directly to a web server and database module located outside a network module and including a database configured to store a file. Rather, Klindt describes a PLC CPU module that is coupled to a web server through a backplane.

Baker does not cure the deficiencies of Klindt. More specifically, Baker does not describe or suggest an ACM system including an ACM CPU that is coupled directly to a web server and database module located outside a network module and including a database configured to store a file. Rather, Baker describes a PLC CPU module that is coupled only to a web server, not a web server and database module located outside a network module and including a database configured to store a file as required in Claim 1.

Accordingly Claim 1 is submitted to be patentable over Klindt in view of Baker.

Claims 2-10 and 19 depend from Claim 1. When the recitations of Claims 2-10 and 19 are considered in combination with the recitations of Claim 1, Applicants submit that Claims 2-10 and 19 likewise are patentable over Klindt in view of Baker.

Claim 11 recites a method for managing and controlling an automation control module (ACM) system including "sending a request for a file from a network to at least one network module; storing the file in a database of a web server and database module; and sending ACM data from an ACM central processing unit (CPU) to the web server and database module to embed the ACM data in the file to facilitate transferring the ACM data to the at least one network module in response to the request, wherein the ACM CPU is coupled directly to the web server and database module."

Klindt does not describe or suggest a method for managing and controlling an ACM system as recited in Claim 11. More specifically, Klindt does not describe or suggest a method, wherein ACM data is sent from an ACM CPU that is coupled directly to a web server and database module located outside a network module and including a database configured to store a file. Rather, Klindt describes a PLC CPU module that is coupled to a web server through a backplane.

Baker does not cure the deficiencies of Klindt. More specifically, Baker does not describe or suggest a method, wherein ACM data is sent from an ACM CPU that is coupled directly to a web server and database module located outside a network module and including a database configured to store a file. Rather, Baker describes a PLC CPU module that is coupled only to a web server, not a web server and database module located outside a network module and including a database configured to store a file as required in Claim 11.

Accordingly Claim 11 is submitted to be patentable over Klindt in view of Baker.

Claims 12-18 depend from Claim 11. When the recitations of Claims 12-18 are considered in combination with the recitations of Claim 11, Applicants submit that Claims 12-18 likewise are patentable over Klindt in view of Baker.

Claim 20 recites a method for managing and controlling an automation control module (ACM) system, the system including at least one network module electrically connected to a network and a web server and database module electrically connected to the network module and located outside the network module, wherein the method includes "receiving a request for a file from the network; storing the file in a database of the web server and database module; and transmitting ACM data to be embedded in the file from an ACM central processing unit (CPU) to facilitate transferring the ACM data to the at least one network module in response to the request, wherein the ACM CPU is coupled directly to the web server and database module."

Klindt does not describe or suggest a method for managing and controlling an ACM system, as is recited in Claim 20. More specifically, Klindt does not describe or suggest a method, wherein ACM data is transmitted from an ACM CPU that is coupled directly to a web server and database module. Rather, Klindt describes a PLC CPU module that is coupled to a web server through a backplane.

Baker does not cure the deficiencies of Klindt. More specifically, Baker does not describe or suggest a method, wherein ACM data is transmitted from an ACM CPU that is coupled directly to a web server and database module. Rather, Baker describes a PLC CPU module that is coupled only to a web server, not a web server and database module as required in Claim 20.

Accordingly Claim 20 is submitted to be patentable over Klindt in view of Baker.

Claims 21-24 depend from Claim 20. When the recitations of Claims 21-24 are considered in combination with the recitations of Claim 20, Applicants submit that Claims 21-24 likewise are patentable over Klindt in view of Baker.

Claim 25 recites a method for managing and controlling network traffic comprising utilizing at least one network module and a web server and database module located outside the at least one network module, wherein the method includes "receiving, by a first network module of the at least one network module, a message via a network; and transferring the

message from the first network module via an automation control module (ACM) backplane to the web server and database module to facilitate transferring the message to the first network module in response to a request, wherein the message is transferred from an ACM central processing unit (CPU) that is coupled directly to the web server and database module."

Klindt does not describe or suggest a method for managing and controlling network traffic, as is recited in Claim 25. More specifically, Klindt does not describe or suggest a method, wherein a message is transferred from an ACM central processing unit (CPU) that is coupled directly to a web server and database module. Rather, Klindt describes a PLC CPU module that is coupled to a web server through a backplane.

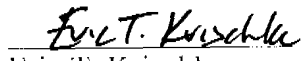
Baker does not cure the deficiencies of Klindt. More specifically, Baker does not describe or suggest a method, wherein a message is transferred from an ACM central processing unit (CPU) that is coupled directly to a web server and database module. Rather, Baker describes a PLC CPU module that is coupled only to a web server, not a web server and database module as required in Claim 25.

Accordingly Claim 25 is submitted to be patentable over Klindt in view of Baker.

Claims 26-30 depend from Claim 25. When the recitations of Claims 26-30 are considered in combination with the recitations of Claim 25, Applicants submit that Claims 26-30 likewise are patentable over Klindt in view of Baker.

In view of the foregoing amendment and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully submitted,



Eric T. Krischke
Registration No. 42,769
ARMSTRONG TEASDALE LLP
One Metropolitan Square, Suite 2600
St. Louis, Missouri 63102-2740
(314) 621-5070